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9 *Attorneys for Defendants LVMPD, James LaRochelle and Thomas Thowsen*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 KIRSTIN BLAISE LOBATO,

13 CASE NO. 2:19-cv-01273-RFB-EJY

14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT; THOMAS THOWSEN,
18 and JAMES LaROCHELLE,

19 **STIPULATION AND ORDER TO**
EXTEND DEADLINES FOR JURY
INSTRUCTIONS, EXHIBIT LISTS AND
TRIAL BRIEFS (FIRST REQUEST)

20 Defendants.

21 IT IS HEREBY STIPULATED between Defendants Las Vegas Metropolitan Police
22 Department (“LVMPD”), Thomas Thowsen, and James LaRochelle (“LVMPD
23 Defendants”), by and through their attorneys of record, Marquis Aurbach, and Plaintiff
24 Kirstin Blaise Lobato (“Plaintiff”), by and through her attorneys of record, Loevy & Loevy,
25 that the deadlines for the jury instructions, the exhibit lists, and the trial briefs be extended
26 from October 21, 2024 until November 1, 2024.

- 27 1. This matter is set for jury trial beginning on December 2, 2024. The parties are
28 anticipating the trial to go that date, and understand they are First on the civil
29 stack for that day. The parties are ready to proceed and there will be many out-
30 of-state witnesses at this trial, including Plaintiff herself, her family members
31 (who are witnesses both to liability and damages), experts retained by both
32 Plaintiff and Defendants, and Plaintiff’s counsel. As a result, this stipulation
33 should not hint, suggest, or imply in anyway the parties are not ready to proceed

1 on December 2, 2024. Quite the opposite.

- 2 2. This Court's April 2, 2024 minute order (ECF No. 113) set the following pretrial
3 deadlines:
- 4 a. Motions in Limine: October 4, 2024
5 b. Exhibit List: October 21, 2024
6 c. Jury Instructions: October 21, 2024
7 d. Proposed Voir Dire: October 21, 2024
8 e. Trial Briefs October 21, 2024
- 9 3. The Court signed the Parties Stipulation and Order to continue Motions in
10 Limine to October 18, 2024. (ECF No. 116.)
- 11 4. Over the past several weeks, the parties have met and conferred via telephone
12 and email regarding the motions in limine and various trial issues. As a result the
13 parties were able to agree on several issues and substantial pair down the
14 necessary motions in limine.
- 15 5. The parties are filing their motions in limine on October 18, 2024.
- 16 6. During the parties multiple meet and confers, the parties have discussed
17 potentially pairing down the remaining claims and issues for trial.
- 18 7. The parties have agreed to review the other parties' motion in limine filings and
19 then continue discussions as to whether further agreements can be reached.
- 20 8. The parties anticipate that additional agreements may be reached on various
21 claims and defenses that will streamline and simplify the trial. These potential
22 agreements will impact Jury Instructions, Trial Briefs, Exhibit Lists, and Witness
23 Lists be extended until **Friday, November 1, 2024**.

24 The parties respectfully request the deadline to file Jury Instructions, Trial Briefs,
25 Exhibit Lists and Witness Lists be extended to **November 1, 2024**.

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1 This request for an extension is not for purposes of delay or bad faith.

2 IT IS SO STIPULATED this 18th day of October, 2024.

3 MARQUIS AURBACH

LOEJVY & LOEJVY

5 By: s/Craig R. Anderson

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11 Attorneys for Plaintiff

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13 **ORDER**

14 IT IS SO ORDERED that the deadline for the jury instructions, the exhibit lists, and
15 the trial briefs be extended from October 21, 2024 until October 31, 2024.

16 DATED: October 21, 2024.

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19 UNITED STATES DISTRICT JUDGE